

HARRIS
ST. LAURENT

July 17, 2020

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

The extension request is so ordered.

Alvin K. Hellerstein /s/
July 17, 2020

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

My firm represents defendant Marc Lawrence in this matter.

Pursuant to this Court's Order dated July 1, 2020 (Docket No. 70), I write to update the Court regarding Mr. Lawrence's continued efforts to search for a third financially responsible person to co-sign his personal recognizance bond.

Since our last update to the Court on July 1, 2020, Mr. Lawrence has spoken to two additional potential co-signers. One of those individuals is in the process of speaking with her attorney, and we should know whether she will consent by sometime next week.

We have discussed Mr. Lawrence's efforts with the Government (AUSA Jilan Kamal and AUSA Sagar Ravi), and they have no objection to an additional two-week extension for Mr. Lawrence to continue his search. Accordingly, we ask the Court to allow Mr. Lawrence to remain at liberty with two co-signers pending the results of his continued search for another financially responsible person. We will update the Court regarding Mr. Lawrence's continued efforts no later than later than July 31.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)